

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

MEDIA MATTERS FOR AMERICA, *et al.*,

Plaintiffs,

v.

WARREN KENNETH PAXTON JR., in his  
official capacity as Attorney General of the  
State of Texas,

Defendant.

CIV. NO. 8:23-3363-PX

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**DECLARATION OF ANGELO CARUSONE IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PROTECTIVE ORDER**

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I, Angelo Carusone, declare as follows:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts and information set forth in this declaration.

2. I am the president of Media Matters for America, one of the Plaintiffs in this action.

3. I learned for the first time from counsel after close of business on Thursday, January 4, 2024, that Defendant Warren Kenneth Paxton, Jr., had filed notice that same evening of his intent to call me as a witness at the hearing scheduled for Monday, January 8, 2024.

4. As of my execution of this declaration, I have not been served with a subpoena to appear at the January 8 hearing.

5. I will not be in Maryland (or the Washington, D.C. metropolitan area) on January 8. I expect to be out of state from January 7 to January 16.

6. Specifically, I have personal travel plans to travel to New York from Sunday,

January 7 through Thursday, January 11, and from New York to California on Thursday, January 11, returning to Washinton, D.C. the following Tuesday, January 16.

7. Any requirement that I prepare for and testify at the January 8 hearing would be a significant disruption to these plans.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 1/5/2024

*Angelo Carusone*

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Angelo Carusone